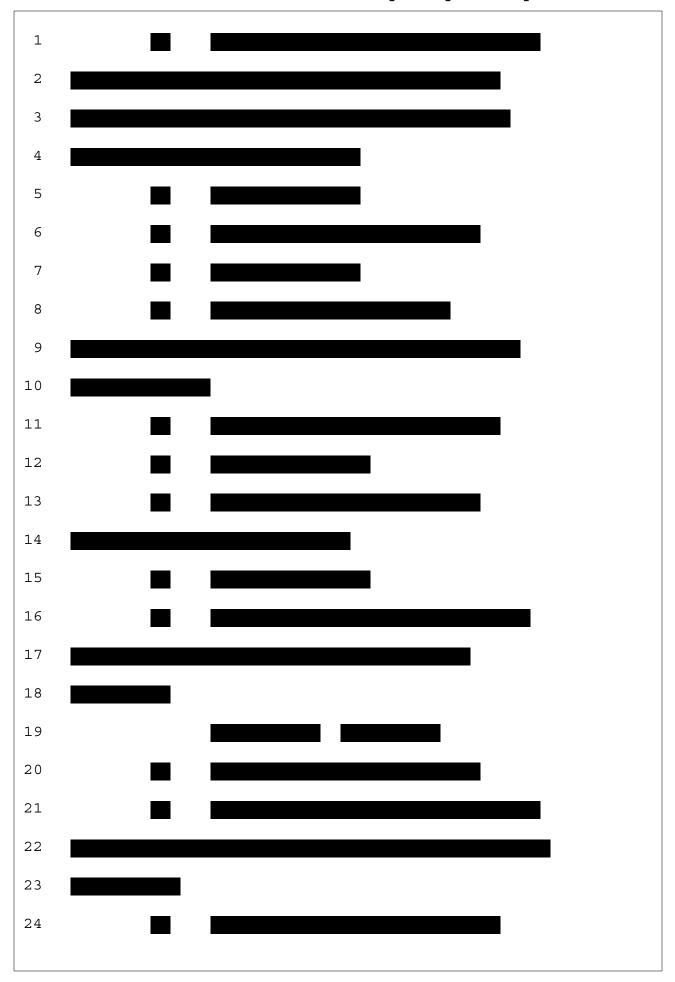
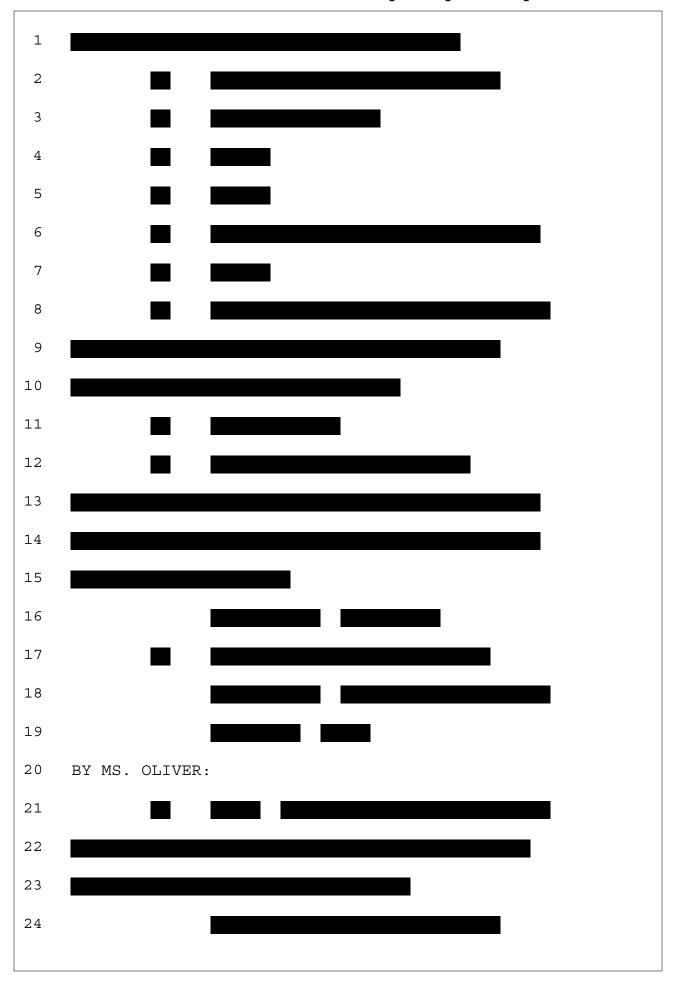
EXHIBIT 119 FILED UNDER SEAL

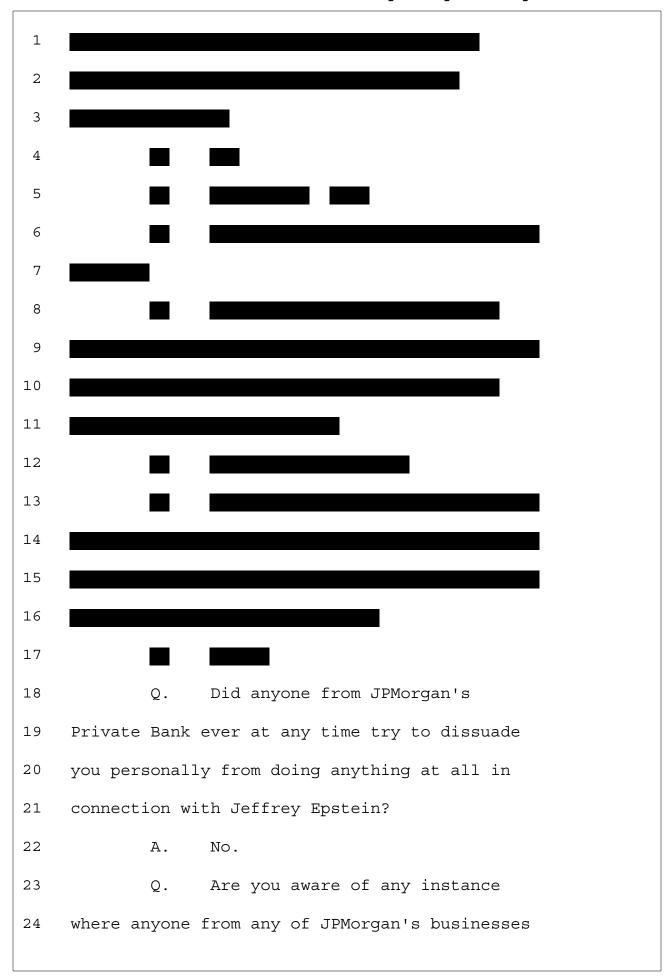
```
IN THE UNITED STATES DISTRICT COURT
 1
           FOR THE SOUTHERN DISTRICT OF NEW YORK
 2
 3
     GOVERNMENT OF THE UNITED
     STATES VIRGIN ISLANDS,
 5
             Plaintiff,
 6
                                   Case No.
        vs.
 7
                                   1:22-cv-10904-JSR
     JPMORGAN CHASE BANK, N.A.,
 8
             Defendant.
 9
10
     JPMORGAN CHASE BANK, N.A.,
11
             Third-Party
             Plaintiff,
12
        vs.
13
     JAMES EDWARD STALEY,
14
             Third-Party
15
             Defendant.
16
17
                 Wednesday, April 19, 2023
            CONFIDENTIAL - ATTORNEYS' EYES ONLY
18
19
            Videotaped deposition of Phillip DeLuca, held
     at the offices of Ulmer & Berne, 65 East State Street,
20
     Columbus, Ohio, commencing at 9:06 a.m., on the above
     date, before Carol A. Kirk, Registered Merit Reporter,
21
     Certified Shorthand Reporter, and Notary Public.
22
23
                GOLKOW LITIGATION SERVICES
                       877.370.DEPS
24
                      deps@golkow.com
```

```
Jeffrey Epstein from the bank?
 1
 2
                   MR. KRAUSE: Objection.
 3
                   You can answer.
             Α.
                   Do I understand -- can you repeat
 4
 5
     that, please?
 6
             Q.
                   Do you know the basis for AML
 7
     Investigations' recommendation to exit
     Mr. Epstein from the bank?
 8
 9
             Α.
                   I believe it was reputational
10
     risk.
             Q.
                   Reputational risk based on what?
11
12
             Α.
                   Based on a prior conviction.
13
                   A prior conviction for what?
             Q.
14
             Α.
                   Some type of sexual activity.
15
             Q.
                   Do you know when relative to
    Mr. Epstein's conviction the recommendation to
16
     exit him from the bank was made?
17
18
             Α.
                   No, I don't.
19
             Q.
                   Do you recall whether AML
20
     Investigations recommended more than once that
21
    Mr. Epstein be exited from the bank?
22
             Α.
                   I don't recall.
23
             Q.
                   Did you speak with Mr. Langford
     about the disagreement between Private Bank and
24
```





1 Q. What did he say in response? 2 Α. "I'll get back to you." 3 Q. Do you recall anything else? Α. Pardon? 4 5 Do you recall anything else about Q. the call? 6 7 Α. No. How was it left? 8 Q. 9 Α. That he would get back to me. 10 So did you ever hear back from Q. 11 Mr. Moyer? 12 Α. About that? No. 13 Did you ever hear back from anyone Q. 14 else at the FBI, whether an investigator, an 15 agent, or otherwise? 16 Α. No. 17 Given your consistent dealings Q. 18 with law enforcement, how did you interpret the 19 fact that the FBI never got back to you about 20 Epstein? 21 That they weren't interested. Α. 22 Q. Okay. One more topic, and then we'll be done. 23 24



tried to dissuade you or any of your colleagues 1 2 from doing anything at all relating to Jeffrey Epstein? 3 I'm not aware of any of them. 4 Α. 5 6 7 8 9 10 11 12 13 14 15 Q. You did or did not develop a good 16 understanding of Maryanne Ryan's temperament and 17 skills from your time working with her? 18 Α. Yes. 19 Q. How skilled was Maryanne as an 20 investigator? 21 Α. Maryanne was extremely skilled. 22 You did or did not develop a good Q. 23 understanding of Maryanne Ryan's temperament 24 from your time working with her?